

Exhibit 2

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August 12, 2024

VIA FEDEX

Michael Torres

146 E. 19th Street, Apt. 3F
Brooklyn, NY 11226

**Re: *State Farm Mutual Automobile Insurance Company v. Metro Pain Specialists, P.C.,
et al., Civil Action No. 1:21-cv-05523-MKB-PK***

Dear Mr. Torres:

On July 18, 2024, State Farm Mutual Automobile Insurance Company (“State Farm”) served you with a subpoena for the production of documents in the above-referenced case (the “Subpoena”). See Exhibit 1 (Subpoena and Affidavit of Service). The Subpoena required you to produce responsive documents within 14 days of service, which means that the deadline for responding to the Subpoena was August 1, 2024. See Fed. R. Civ. P. 45(d)(2)(B). To date, we have received no response from you. Accordingly, you have waived any and all objections to the Subpoena. See *Concord Boat Corp. v. Brunswick Corp.*, 169 F.R.D. 44, 48 (S.D.N.Y. 1996); *Sheet Metal Workers’ Nat’l Pension Fund v. Amodeo*, 2016 WL 3080807, at *7 (E.D.N.Y. May 27, 2016). Moreover, failure to obey the Subpoena may result in a court holding you in contempt. Fed. R. Civ. P. 45(g) (“The court for the district where compliance is required . . . may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.”). Please produce documents responsive to the Subpoena by August 22, 2024. If you fail to do so, State Farm will be forced to seek Court intervention.

Sincerely,

/s/ Christopher T. Cook

Christopher T. Cook

Encl. (Exhibit 1)